

UNITED STATES DISTRICT COURT

for the

Eastren District of Oklahoma

Muskogee Division

Case No.

21-cv-326-Raw

(to be filled in by the Clerk's Office)

Manetirony Clervrain; Francis Cobbina Osei-Fosu

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Merrick B. Garland;John M. O'Connor; Paul B. Hunker , III;Shannon Clark; Candice Kerestan;Art Schankler;Beth Landry;Quyen Nguyen; Orlando Vidal; Steve Nardi; Nicholas Gordon; Jennifer Rakow-Stepper;Scott J. Hamilton;Andrew Rickel;Angela Allmond;Andrew Rickel;Angela Allmond; Ryan Starkweather;Tucker Gambill;Eric Smith;Steve Nardi;Joan Stack Miguel Madrigal;Maxine Torres; Randi Weitzner;Richard Pearson; Erin Kotecki Vest ;Melanie Gardner; William Chapman ;Michaele DE Rivera;Jude Wallesen;Brian Moran;Stephanie Mattes; John Reardon ;Samantha Tigner ;Daniel Galimidi; Ronny Rubin;Gaio Doria;Joseph Weiss;Jacqueline de Britto;Mary Laverty;Brian Stout;Carolina Carter; Rob Simmons;Sydney Slotkin ;Julia Larkin; steven Johnson; Angie Vachio;Maxine Torres;Kathy Rothschild; David Ware;Nathaniel Adams;Krystal Grullon;Ellie Wallis;Ron Ortiz Dinkel;Sharon Burns Carol Winters;Kee Evans;John Chudy;Phyllis MacCartney;Vincent D'Agati;Amber Walsh;William McElroy;Anna Reeve;Rachel Pierre-Champagne;Kim Antonsen;Timothy Connelly;Joyce Kinnear;Marcia Henry-Lokay;Leda Perez;felipe reinoso;Monique Loayza;Nadine Freeman;

Jury Trial: (check one) Yes No

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Non-Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Manetirony Clervrain		
Address	4326 S Scatterfield Rd Suite 153		
County	Anderson	IN	46013
Telephone Number	City	State	Zip Code
E-Mail Address	Madison		
	7652789806		
	monticlervrain@gmail.com		

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name	Merrick B. Garland		
Job or Title (<i>if known</i>)	Attorney General		
Address	950 Pennsylvania Avenue, NW		
	Washington	DC	20530

	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County			
Telephone Number	2025142000		
E-Mail Address (<i>if known</i>)			

Individual capacity Official capacity

Defendant No. 2

Name	John M. O'Connor		
Job or Title (<i>if known</i>)	Oklahoma Attorney General		
Address	313 NE 21st Street		
	Oklahoma	OK	73105
	<i>City</i>	<i>State</i>	<i>Zip Code</i>

County			
Telephone Number	4055213921		
E-Mail Address (<i>if known</i>)			

Individual capacity Official capacity

Defendant No. 3

Name	Scott J. Hamilton		
Job or Title (<i>if known</i>)	Executive Director Oklahoma Democratic Party		
Address	3815 N Santa Fe Ave., Suite 122		
	Oklahoma City	OK	73118
	<i>City</i>	<i>State</i>	<i>Zip Code</i>

County			
Telephone Number	4055362411		
E-Mail Address (<i>if known</i>)			

Individual capacity Official capacity

Defendant No. 4

Name	Candice Kerestan		
Job or Title (<i>if known</i>)	International Chair-Germany Democratic Party		
Address	P.O Box 15130		
	Washington	DC	20003
	<i>City</i>	<i>State</i>	<i>Zip Code</i>

County			
Telephone Number			
E-Mail Address (<i>if known</i>)			

Individual capacity Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (*check all that apply*):

- Federal officials (a *Bivens* claim)
- State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

While the plaintiff who is the Activist , or ["The Ant"] or ["The Ant Act"] (TAA"), or matter to promote Justice against putive Laws under ("MOCMA"),at page 1 or for judicial intervention and clarificaton Necasry, thus the defendants are liable in both under ("MOCMA") at page, 94-99 for officials capacities, also the defendants are liable for controversies claims (Under ("NIRTA") subejct to amend for additional parties, at page 9-65, or for supplemtal jurisdiction against the defendants in the individual capacities... see ["Motion for Judicial Intervention and Clarification Necessary by Invoking te Movement (s) On Crimes Mitigating Act"] ("MOCMA"), or to apply additional Judisdiction under the (FOIA), which the courts failed to review de nove for related Matters, at page 61-66 for the court to response each of the pending motions filed, or to compel the administrative records within the meaning the applicable laws.....or the same purpose for the defedants to justify action under the Civi Right Act (CRA)...had previously remarked that the latter was designed to "extend to all parts of the country," on a permanent basis, the "equal civil rights" which were to have been the force of law against punitive laws, or against the above the defendants as the leader of the criminal enterprises, indeed they are racist by Nature to justify their action within the proper meaning of the word ["Alien"] and [" Status"] to say that ["Alien Status"] is unconstitutional per se, Moreover, federal agencies had only limited authority to settle claims Under the ("APA") that is because the vast majority of claims ultimately must settled before trial, that Congress amend both the ("CRA") and the ("APA") to resolve controversies claims ony in such exctional situationto "requir[e] all claims to be presented to the appropriate agency for consideration and possible settlement after the violation as occured to be instituted. This procedure would make it possible for the claim first to be considered by the agency whose employee's activity allegedly caused the damage. That agency would have the best information concerning the activity which gave rise to the claim. Since it is the one directly concerned, it can be expected that claims which are found to be meritorious can be settled more quickly without the need for filing suit and possible expensive and time-consuming litigation for the Enacment of the ["The Ant(s) Dury Mitigating Act"] (TADMA)), or pending to prove the defenants illegal actions.... or pending for additional damages against their criminal enterprises will be justified by congressional intent,, to preempt may, in some case, only be apparent by implication, the congressional purpose can nevertheless be clear. It should be noted..... proper and constitutional exercise of the legislative power of the United States. Nor is there any intimation that the state of Wisconsin or its political subdivisions lack the police power to enact the the ["National Protective Act"] ("NPA"), or ["Universal Nationality Character Act"] (UNCA)

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

Under the same applicable laws the defendants are liable for certain claims Under this ["Motions for Unreasonable Classification Act by compelling performance Movement On crimes Mitigating ("MOCMA"), or matter for constitutional violations, and violation of Human Rights The applicability of this norm to private individuals is also confirmed by the Genocide Convention Implementation Act of 1987, 18 U.S.C. §(s) 1091 (1988), which criminalizes acts of genocide without regard to whether the offender is acting under color of law, see id. Section(s) 1091(a) ("[w]hoever" commits genocide shall be punished), if the crime is committed within the United States or by a U.S. national, id. Section(s) 1091(d). Though Congress provided that the Genocide Convention Implementation Act shall not "be construed as creating any substantive or procedural right enforceable by law by any party in any proceeding," id. Section(s) 1092, the legislative decision not to create a new private remedy does not imply that a private remedy is not already available under the ["Alien Tort Act"] or ["The Ant Act"] (TAA). Nothing in the Genocide Convention Implementation Act or its legislative history reveals an intent by Congress to repeal the Alien Tort Act insofar as it applies to genocide, and the two statutes are surely not repugnant to each other. Under these circumstances the defendants are liable under the Civil Right Act ("CRA"), as well as the Foreign Sovereign Immunities Act of 1976, 28 U.S.C. § 1330, is a "comprehensive scheme" comprising both pure jurisdictional provisions and federal law capable of supporting Art. III "arising under" jurisdiction.). Moreover, in the District Court must view, allowing all actions against foreign sovereigns, including those initiated by foreign plaintiffs, to be brought in federal court was necessary to effectuate "the Congressional purpose of concentrating litigation against sovereign states in the federal courts in order to aid the development of a uniform body of federal law governing assertions of claims under this ["Motion for settlement Agreement(s) Against Secretive Criminals by Invoking the National Regulatory Treaties Act ("NIRTA"), or for additional defendants to be consider for additional reliefs including to invoke the Patent Act of 1836, however, Congress changed course and made enhanced damages discretionary, specifying that "it shall be in the power of the court to render judgment for any sum above the amount found by good faith analysis, or Humanitarian factors must also be consider when evaluating intellect intent.....if the The showing of congressional intent necessary to support an exercise of extraterritorial jurisdiction depends in the first instance on whether that exercise of jurisdiction.

D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

Additionally, the defendants are also liable Under ("TADMA") for the same purpose or the Enactment of the Ant(s) Movement Act ("TAMA") where the injury is wanton or malicious, a jury may inflict vindictive or exemplary damages, not to recompense the plaintiff, but to punish the defendant see Motion for consideration or Compelling Need(s) or controversies to litigate by invoking the Ant(s) Duty Mitigating Act (TADMA") or claim against the defendant for conspiracy with the premise that original jurisdiction in civil rights and elective franchise conferred by 28 U.S.C. § 1343, is unique, special and limited and made available for the expeditious vindication of persons which are subject to deprivation on pretenses of lawful conduct by State agents..., or all of the other defendants will be identified to the courts to additional filing of Motions or quotation, that is also the duty of the defendant duty to mitigate crimes , or their performance must be evaluate the the proper channel or National Relief request as part of their conspiracy.....to be submitted that applying the traditional common law rule is partially to justify if the laws in question if matter of fact or to be voted..

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

Under ("MOCMA") or mater for Judicial intervention ["17-CV-03194"], Dkt, 1],which the plaintiff alleged that the defendants violated his first amendment Rights concerning in their official capacities , or control theory request for review common sense , or common crimes or public public opinions by the this ["Motion for Comon Sense or access to the Informative Legal Materials or opposition by the ("Ant(s) Library Act "] ("TALA"). That public funding will lead to better Education or to promote parenting Role against culture schoking by the defedants, or their executive, internal affairs of political parties, and thus to a significant loss of political freedom. The concern is necessarily wholly speculative and the basis for validation of the public financing scheme on its face. congress has expressed its determination to avoid the possibility..that all of the agencies must release their adminisratrative records.

B. What date and approximate time did the events giving rise to your claim(s) occur?

Under ("TADMA") addressing part of the allegation pending to file this ["Motions for enforcing Power or developing Guidance against Facialiy Attack by Invoking the Ant(s) Nationality Act"] ("TANA") or Matter for controversies for the court to certify within the reasoning standard, that is because the ripeness and standing doctrines "overlap," claims that were sufficiently "actual and imminent" to establish Article III standing also were ripe for adjudication, "not merely speculative or hypothetical"

C. What are the facts underlying your claim(s)? (For example: *What happened to you? Who did what? Was anyone else involved? Who else saw what happened?*)

Unde ["The Ant (S) Nationality Act"] ("TANA") or ["The Nationality Act "] ("TNA") or to say that the ("INA") is a puitive Law, to apply the concept of ("MOCMA") or for declaration of Right the laws are unconstitutional, at page 60 (II) for which the plaintiff is challenging the various laws, or pending to file this motion Motion for Material of Facts and Marticular situation Demand(s) for controversies by Invoking the Ant Nati Nationality Act ("TANA") of material fact, even with respect to issues that the non-moving party would have the burden of proving at trial, or regarding pretext for the exclusion to ("FOIA"), Public Ceremoney, and he was a victim of the defendants injustice practices against the various judicial officials pending to identify the claims to ("MIGRA") or concerning public interest against Genocide, that is for the Court to finds that plaintiffs have stated a cognizable claim under international law for the restriction imposed against me by punitive laws and the defendants for aiding and abetting genocide, and for conspiracy to violated access to the courts and federal official while in the custody, all violations of international law. The facts, as pled, are sufficient to demonstrate potential liability against each defendants and, as such, will preclude dismissal on 12(b)(6) grounds.

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

That the sufficient specification of when the injury in fact will occur is necessary under ("TAJA") or that his speech, then must concludes that any "procedural injury" suffered by the activist against his movement is sufficient to confer standing, or for additional injuries in fact by this ["Motion for International Extrusion by questioning (The Ant) Criminal Massive Issues for Genocide Act"] ("MOGRA") or matter for extradition hearing under the Uniform Crime Extrusion Act ("UCEA") to repeal by ("UCCA"). Generally speaking, evidence of other crimes is competent to prove the specific crime charged when it tends to establish (1) motive; (2) intent; (3) the absence of mistake or accident; (4) a common scheme or plan embracing the commission of two or more crimes so related to each other that proof of one tends to establish the others; (5) the identity of the person charged with the commission of the crime on trial, then we asking the courts if they must extradited the Haitian polititian for committed serious crimes against the people, then he asking for invading ["Haiti"], because the defendants are very negligence, or pending for applying Democrcy Rights.....that the people are suffered for years by crimes of Apartheid, Humanity and among the other to be proving by circumstatial evidence must "form a complete chain which, in light of the evidence as a whole, leads so directly to the guilt of the accused as to include matters for beyond a reasonable doubt, therefore, these courts must allowing the Brandako, Management team to prove their ["Prolificing Status"] against ["Alien Status"] which the proximate cause of the pauperis Status.

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

At this point the plaintiff is asking for damages , that must be granted , as well as he is asking for \$60 billions for the alleged injuris in facts , \$35 billions dollars for the development of the ["brandako, Inc"], and \$100 Millions dollars against each individuals involved in the conspiracy, that is because they are also liable for intervning cause, ratification theory,or failure to ratify the alleged punitive laws..... among the other to be developed by laws.... and for the courts to docket the defendants information properly upon electronically file the motion so call ("TANA") and ("TALA"), then we asking the court for National reliefs against judicial officials restrictions, or another \$ 6 billion for exemplary damages or additional liabilty against them for failure to allow Non-Attorney Access to electronic filling, this Notice (s) to the court for docketing statements to litigate by invoking uder ("MOCMA") at, page 94-99 stattes additional defendants as well as under ("TALA"), at page 42-50, it is matter for[" invention right"], or]"Protection Rights"] and ["Trademark rights"] by both domestic and international defendants to protect the plaintiff names, idealogistic concern against criminal enterprises within this ["Notice to the courts for Dockets Statements to litigate by National Electronic Filling Reform Act (NEFRA") or for Initiating legal process to protect public interest by the ["National Infomative Public Grievous Association ("NIPGA"); ["National Educative Bar Association Science "] ["NEDBAS"] and the Word Educative Science Association ("WEDSA) to be developed wordewide by invoking public opinions , or right for pubication at the defendants expenses, that must include all other damages upon other investigation while in the presedures of the claims and his ("FOIA") must be granted additional Damages, among the others to litigate controversies, or any other reliefs to court might find just and proper....

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 10/10/2021

Signature of Plaintiff S/ Manetirony Clervrain
Printed Name of Plaintiff MANETIRONY CLERVRAIN

B. For Attorneys

Date of signing: 10/10/2021

Signature of Attorney	<u>S/Manetirony Clervrain</u>		
Printed Name of Attorney	<u>MANETIRONY CLERVRAIN</u>		
Bar Number	<u>Competent to be proving by laws</u>		
Name of Law Firm	<u>Prolifico, Inc</u>		
Address	<u>4326 S scatterfield Rd Suite 153</u>		
	<u>Anderson</u>	<u>IN</u>	<u>46013</u>
	<u>City</u>	<u>State</u>	<u>Zip Code</u>
Telephone Number	<u>7652789806</u>		
E-mail Address	<u>monticlervrain</u>		